

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	Chapter 11
	§	
FIRED UP, INC.,	§	CASE NO. 14-10447-TMD
	§	
Debtor.	§	
	§	

MOTION FOR PRO HAC VICE

COMES NOW, Peter J. Keane (“Applicant”) and moves this Court to grant admission to the United States Bankruptcy Court for the Western District of Texas *pro hac vice* as proposed counsel to the Official Committee of Unsecured Creditors in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney with the law firm of Pachulski Stang Ziehl & Jones, LLP with an office at:

Peter J. Keane
Pachulski Stang Ziehl & Jones, LLP
919 North Market Street, 17th Floor
Wilmington, DE 19801
(302) 652-4100 (Telephone)
(302) 652-4400 (Facsimile)
pkeane@pszjlaw.com

2. Since 2008, Applicant has been and presently is a member of and in good standing with the Bar of the Commonwealth of Pennsylvania. Applicant’s bar license number is 208746.

3. Since 2010, Applicant has been and presently is a member of and in good standing with the Bar of the State of New Hampshire. Applicant’s bar license number is 19874.

4. Since 2010, Applicant has been and presently is a member of and in good standing with the Bar of the State of Delaware. Applicant's bar license number is 5503.

5. Applicant has been admitted to practice before the following state and federal courts:

<u>Court</u>	<u>Admission Date</u>	<u>Bar Number</u>
Commonwealth of Pennsylvania	2008	208746
State of New Hampshire	2010	19874
State of Delaware	2010	5503
U.S. District Court for the District of New Hampshire	2010	--
U.S. District Court for the District of Delaware	2011	--
U.S. District Court for the Eastern District of Pennsylvania	2011	--
U.S. Court of Appeals for the Third Circuit	2012	--

6. Applicant is presently a member in good standing of the bars of the courts listed above, and is not currently suspended or disbarred in any other court.

7. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.

8. Applicant is eligible to practice in the Bankruptcy Court.

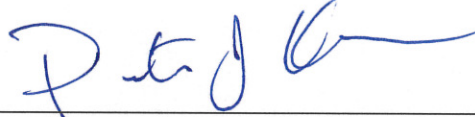
9. Applicant has read and is familiar with the Local Rules of the Western District of Texas Bankruptcy Court and is also subject to all rules of practice of the U.S. District Court for the Western District of Texas and will comply with the standards of practice set out therein.

10. Applicant has not requested admission *pro hac vice* in the Bankruptcy Court for the Western District of Texas in the preceding twelve months.

WHEREFORE, Applicant prays that this Court enter an order permitting the admission of Peter J. Keane to the U.S. Bankruptcy Court for the Western District of Texas *pro hac vice* for this case only.

Dated: April 16, 2014

Respectfully submitted,



[SIGNATURE OF APPLICANT]

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**PROPOSED COUNSEL FOR OFFICIAL
COMMITTEE OF UNSECURED CREDITORS**

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record via the Court's ECF transmission list in this case and the original upon the Clerk of the Court on this 16th day of April, 2014.



Peter J. Keane